1 2 3 4 5 6 7 8 9	MORGAN, LEWIS & BOCKIUS LLP Rachael C. Chan (CA Bar No. 265002) rachael.chan@morganlewis.com One Market, Spear Street Tower San Francisco, CA 94105 Tel: 415.442.1000; Fax: 415.442.1001 Brian T. Ortelere (pro hac vice) brian.ortelere@morganlewis.com 1701 Market Street Philadelphia, PA 19103-2921 Tel: 215.963.5000; Fax: 215.963.5001 Matthew A. Russell (pro hac vice) matthew.russell@morganlewis.com 77 West Wacker Drive Chicago, IL 60601 Tel: 312.324.1771; Fax: 312.324.1001	
11	Attorneys for Defendant Mercer Investment Consulting	
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13	UNITED STATES DISTRICT COURT	
14	NORTHERN DISTRIC	ICT OF CALIFORNIA
15	OAKLAND DIVISION	
16	CHARLES BAIRD, et al.,	Case No. 4:17-cv-01892-HSG
17	Plaintiffs,	DECLARATION OF MATTHEW A.
18	vs.	RUSSELL IN SUPPORT OF DEFENDANT MERCER
19	BLACKROCK INSTITUTIONAL TRUST COMPANY, N.A., et al.,	INVESTMENT CONSULTING'S OPPOSITION TO PLAINTIFFS' MOTION FOR CERTIFICATION OF THE CTI CLASS AND BLACKROCK
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21	Defendants.	PLAN CLASS
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28		M. RUSSELL DECL. IN SUPPORT MERCER'S OPPOSITION TO PLAINTIF

MORGAN, LEWIS &
BOCKIUS LLP
ATTORNEYS AT LAW
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M. RUSSELL DECL. IN SUPPORT OF MERCER'S OPPOSITION TO PLAINTIFFS' MOTION FOR CLASS CERTIFICATION 4:17-CV-01892-HSG 2

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- 1. I am an attorney at the law firm of Morgan, Lewis & Bockius LLP, counsel for Defendant Mercer Investment Consulting ("Mercer") in the above-referenced matter. I submit this declaration in support of the concurrently filed Defendant Mercer Investment Consulting's Opposition to Plaintiffs' Motion for Certification of the CTI Class and BlackRock Plan Class (ECF No. 291-4).
- 2. I have personal knowledge of the following facts and, if called to testify, I would testify competently thereto.
- 3. Attached hereto as Exhibit A is a true and correct copy of BlackRock Retirement Savings Plan ("Plan") Account Statements for Plaintiff Baird. It is my understanding that these documents were produced by the BlackRock Defendants in this case, labeled BAIRD_0000444-651, and designated by the BlackRock Defendants as Confidential, and thus filed under seal.
- 4. Attached hereto as Exhibit B is a true and correct copy of relevant excerpts of the transcript of the November 7, 2018 deposition of Plaintiff Charles Baird in this case.
- 5. Attached hereto as Exhibit C is a true and correct copy of BlackRock Plan Account Statements for Plaintiff Lauren Slayton. It is my understanding that these documents were produced by the BlackRock Defendants in this case, labeled BAIRD_0045504-729, and designated by the BlackRock Defendants as Confidential, and thus filed under seal.
- 6. Attached hereto as Exhibit D is a true and correct copy of relevant excerpts of the transcript of the November 6, 2018 deposition of Plaintiff Lauren Slayton in this case.
- 7. Attached hereto as Exhibit E is a true and correct copy of a document produced by the Plaintiffs in this case, labeled BRPL_000311-14. It is also my understanding that for the purposes of this filing, Plaintiffs have redacted identifying information of non-parties.
- 8. Attached hereto as Exhibit F is a true and correct copy of a May 2017 email exchange from Plaintiff Lauren Slayton. It understand that this document was produced by the Plaintiffs in this case, labeled as BRPL_000308-09. It is also my understanding that for the purposes of this filing, Plaintiffs have redacted identifying information of non-parties.

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1	9. Attached hereto as Exhibit G is a true and correct copy of a March 9, 2011	
2	presentation, produced by the BlackRock Defendants in this case, labeled as BAIRD_0047733-	
3	49, and designated by the BlackRock Defendants as Confidential and thus filed under seal.	
4	10. Attached hereto as Exhibit H is a true and correct copy of September 2012	
5	presentation, produced by the BlackRock Defendants in this case, labeled as BAIRD_0042469-	
6	505, and designated by the BlackRock Defendants as Confidential and thus filed under seal.	
7	11. Attached hereto as Exhibit I is a true and correct copy of Mar. 4, 2014 Investment	
8	Committee Meeting Minutes, produced by the BlackRock Defendants in this case, labeled as	
9	BAIRD_0043319-22, and designated by the BlackRock Defendants as Confidential and thus filed	
10	under seal.	
11	12. Attached hereto as Exhibit J is a true and correct copy of June 12, 2014	
12	presentation, produced by the BlackRock Defendants in this case, labeled as BAIRD_0043324-	
13	59, and designated by the BlackRock Defendants as Confidential and thus filed under seal.	
14	13. Attached hereto as Exhibit K is a true and correct copy of March 19, 2018 Mercer	
15	presentation, produced by Mercer in this case, labeled as MERCER00003962-67, and designated	
16	by the Mercer as Confidential and thus filed under seal.	
17	I declare under penalty of perjury under the laws of the United States that the foregoing is	
18	true and correct and that this declaration was executed on July 3, 2019.	
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20	/s/ Matthew A. Russell	
21	Matthew A. Russell	
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28	M. RUSSELL DECL. IN SUPPORT OF	
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